

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 12 (MC2009-28)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-38

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(August 16, 2012)

In Order No. 1374, issued June 20, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until August 31, 2012. The Postal Service and the customer have been working diligently to reach a new agreement over the past two months, to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, the Postal Service and the customer have thus far been unable to reach an agreement on the pricing and terms for the new contract. The delay is primarily a result of the need for the Postal Service to schedule and execute a cube study of the customer's packages, in order to assist both parties in negotiating new prices for a replacement contract.

Nevertheless, the Postal Service and the customer are making progress toward reaching an agreement on a new contract, and expect to file it with the Commission in the near future, after negotiations have completed. Both parties desire to continue their current contractual relationship during this interim period, until a new agreement has been signed and has been approved by the Commission. Thus, the customer continues to face the prospect of an interruption in its access to negotiated rates as a result of the

processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional sixty-day extension to allow the existing contract to remain in effect until such time as the Commission is able to complete its review of the new agreement. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for sixty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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